

## UNITED STATES DISTRICT COURT

for the  
District of New MexicoUnited States of America  
v.Jessica HERNANDEZ  
Sir Jason Douglas JR ROBINSON*Defendant(s)*

Case No: 20mj161

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief. On or about the date of January 15, 2020 in the county of Dona Ana in the State and District of New Mexico, the defendant violated 8 U.S.C. § 1324(a)(1)(A)(ii)(Transporting), 1324(a)(1)(A)(v)(I)(Conspiracy to Violate 1324 - All subsections), an offense described as follows:

Knowingly, intentionally, and unlawfully conspired, combined, confederated and agreed with others known and unknown, to commit offenses against the United States, namely: to transport, move, and attempt to transport and move an alien within the United States by means of transportation and otherwise knowing or in reckless disregard of the fact that Material Witness 1 and Material Witness 2, had come to, entered, or remained in the United States in violation of law, transport, or move or attempt to transport or move such aliens within the United States by means of transportation or otherwise,

This criminal complaint is based on these facts:

On January 15, 2020 Border Patrol Agents (BPAs) encountered Defendant Hernandez, Jessica and Co Defendant ROBINSON, Sir Jason Douglas circumventing the United States Border Patrol Checkpoint located on Interstate 10 at or around mile marker 120.5 west of Las Cruces, New Mexico in Dona Ana County. Defendant HERNANDEZ was driving a gray Chrysler 300 and Defendant ROBINSON was driving a red Chevy Tahoe. BPAs conducted a roving patrol stop on both vehicles separately.

BPAs questioned Defendant ROBINSON as to his citizenship to which he admitted to being a United States Citizen.

☒ Continued on the attached sheet.



*Complainant's signature*

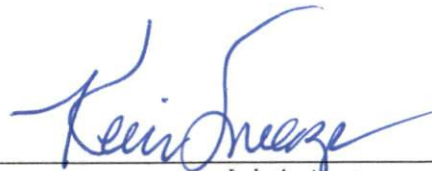
Daniel Perales, Agent

*Printed name and title*

Sworn to before me and signed in my presence.

Date: January 16, 2020

City and state: Las Cruces, N.M.



KEVIN R. SWEAZE  
U.S. MAGISTRATE JUDGE

*Printed name and title*

CONTINUATION OF CRIMINAL COMPLAINT

STATE AND DISTRICT OF NEW MEXICO

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**Continuation of Statement of Facts:**

BPA's questioned the five other individuals in the vehicle to which they admitted to being Mexican citizens illegally present in the United States. Defendant ROBINSON and the five illegal aliens were placed under arrest. Further questioning of Defendant ROBINSON revealed that Defendant HERNANDEZ was also involved in the alien smuggling attempt.

BPA's questioned Defendant HERNANDEZ as to her citizenship to which she admitted to being a United States Citizen. BPA's questioning Defendant HERNANDEZ received the information from the BPA's questioning Defendant ROBINSON in regards to her involvement in the smuggling attempt. Defendant HERNANDEZ was placed under arrest.

Post Miranda statement of Defendant ROBINSON.

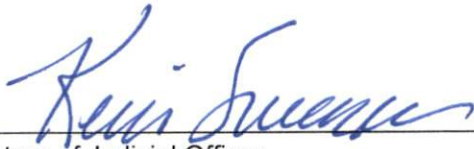
Defendant ROBINSON stated that he was contacted by a known individual offering him a job driving a vehicle from El Paso, Texas to New Mexico to which he agreed. Defendant ROBINSON was picked up by Defendant HERNANDEZ in Midland, Texas and driven to El Paso, Texas. Upon arriving in El Paso, Defendant ROBINSON was given keys to the red Chevy Tahoe and was told to wait until Defendant HERNANDEZ texted him with further instructions. Defendant ROBINSON received a text from Defendant HERNANDEZ instructing him to meet her at a local motel. Defendant ROBINSON stated that upon arrival at the motel five individuals got into the red Chevy Tahoe that he was driving, he was also told by Defendant HERNANDEZ to follow her to the final destination.

Post Miranda Material Witness (Mat Wit) Statements

Mat Wit 1 and Mat Wit 2 stated they were picked up at the motel they were staying at by Defendant HERNANDEZ and Defendant ROBINSON. Mat Wits stated Defendant HERNANDEZ instructed them to get into the Chevy Tahoe driven by Defendant ROBINSON. Mat Wits stated Defendant ROBINSON followed Defendant HERNANDEZ. Mat Wits stated Defendant HERNANDEZ remained the lead vehicle until Defendant ROBINSON received a text, at which time Defendant ROBINSON took the Lead. Mat Wits also stated that neither the Mat Wits nor the other illegal aliens conversed or communicated with Defendant ROBINSON.

**Continuation of Statutory Language:**

in furtherance of such violation of law



\_\_\_\_\_  
Signature of Judicial Officer

KEVIN R. SWEAZE  
U.S. MAGISTRATE JUDGE



\_\_\_\_\_  
Signature of Complainant

Perales, Daniel  
\_\_\_\_\_  
Filing Agent